


**COMMONWEALTH OF VIRGINIA**  
**Department of Environmental Quality**  
**Office of Water Permit Support**  
629 East Main Street    Richmond, Virginia 23219

**MEMORANDUM**

**Subject:**        QL related update to guidance #00-2011, Amendment #2

**To:**             Regional Directors

**From:**        Larry G. Lawson 

**Date:**         October 3, 2001

**Copies:**       Regional Permit Managers, Regional Water Permit Managers, Regional Enforcement/Compliance Managers, Martin Ferguson, Richard Ayers, Dale Phillips, George Cosby, Alison Kittle, Phani Eturu, Alan Pollock

This amendment modifies amendment #1 by revising the requirements for reporting average results. The previous amendment made provisions for reporting monthly and weekly averages as <QL. Further, discussions among the staff have resulted in the recommendation to report the average as calculated. The changes are in the special condition for compliance reporting.

**Background:**

Data requirements for CEDS and PCS make it necessary for us to achieve consistency in the way permittees report data that are below the quantification level. We currently have permits that have a variety of reporting requirements in this regard. A review of existing and past guidance reveals that there is also inconsistency there. It has also come to our attention that, in order to provide the proper data to EPA, the staff must modify the data reported on the DMR. This is not appropriate and this update will correct that situation.

**The Update:**

The update simply recommends having the permittee report data that is less than the quantification level as "<QL". CEDS will be programmed so that data will be properly uploaded to EPA, The person entering the data will not have to modify it and a violation will not be reported in the QNCR if "<QL" is entered. Any other entry will result in a violation being reported if it is higher than the limit.

The attachment contains the revised language and replaces page 110 in guidance #00-2011.

**Implementation:**

Please implement this immediately in all new or reissued permits.

Permits that have different requirements than those in the attached condition for reporting data that are less than the quantification level can be corrected as a minor modification by simply sending the owner a revised special condition for his permit. In order to correct the current problems, we would suggest that major permits that contain this special condition be modified immediately. Minor permit may be modified as time and resources allow.

Note: the disclaimer in the original guidance applies to this update.

Please contact Dale Phillips @ 804-698-4077 if you have any question about this revision to the guidance.

## **SPECIAL CONDITION FOR COMPLIANCE REPORTING**

A special condition should be included in all permits that include limits for materials that have identified quantification levels. An example follows:

Compliance Reporting Under Part I.A.

1. The quantification levels (QL) shall be as follows:

<u>Effluent Characteristic</u>	<u>Quantification Level</u>
Chlorine	0.1 mg/l
Ammonia-N	0.2 mg/l
Total Recoverable Cadmium	0.8 : g/l
Total Recoverable Copper	7.2 : g/l
Total Recoverable Nickel	13 : g/l
Total Recoverable Zinc	52 : g/l

1. Reporting

- a. Monthly Average -- Compliance with the monthly average limitations and/or reporting requirements for the parameters listed in Part I.B.1. shall be determined as follows: All data below the QL listed above shall be treated as zero. All data equal to or above the QL listed in 1. above shall be treated as it is reported. An arithmetic average shall be calculated using all reported data, including the defined zeros, for the month. This arithmetic average shall be reported on the DMR as calculated. If all data are below the QL then the average shall be reported as <QL.

### **EITHER**

- b. Weekly Average (for municipal effluents) -- Compliance with the weekly average limitations and/or reporting requirements for the parameters listed in Part I.B.1. shall be determined as follows: All data below the QL listed in 1. above shall be treated as zero. All data equal to or above the QL shall be treated as reported. An arithmetic average shall be calculated using all reported data, including the defined zeros, collected within each complete calendar week and contained within the reporting month. The maximum value of the weekly averages thus determined shall be reported on the DMR. If all data are below the QL then the average shall be reported as <QL.

### **OR**

- b. Daily maximum (for industrial effluents) -- Compliance with the daily maximum limitations and/or reporting requirements for the parameters listed in Part I.B.1. shall be determined as follows: All data below the QL listed in 1. above shall be treated as zero. All data equal to or above the QL shall be treated as reported. An arithmetic average of the values shall be calculated using all reported data, including the defined zeros, collected for each day during the reporting month. The maximum value of these daily averages thus determined shall be reported on the DMR as the Daily Maximum. If all data are below the QL then the average shall be reported as <QL.
- c. Any single datum required shall be reported as "<QL" if it is less than the QL listed in 1. above. Otherwise the numerical value shall be reported.